

10:29:01 1 first started, you started working at Kitty Hawk. And
10:29:04 2 this indicates that for your first campus assignment,
10:29:09 3 number 42, you're representing to me that that you
10:29:11 4 think that was Kitty Hawk?

10:29:13 5 A. Yes.

10:29:13 6 Q. Okay. And it looks like at some point about
10:29:27 7 seven pages in here, there was a campus where the home
10:29:34 8 campus notation indicates a number 43. Do you see
10:29:39 9 where I'm looking?

10:29:40 10 A. Yes.

10:29:40 11 Q. And where did -- where did you work after Kitty
10:29:44 12 Hawk? Do you remember?

10:29:45 13 A. At Woodlake Hills.

10:29:47 14 Q. So in 1997 you went to Woodlake Hills?

10:29:50 15 A. Yes.

10:29:54 16 Q. So 43 would be Woodlake Hills; correct?

10:29:59 17 A. I think, yes.

10:30:03 18 Q. And in 1997 when you went to Woodlake Hills,
10:30:09 19 did your sister work at Woodlake Hills?

10:30:11 20 A. Yes, I think so.

10:30:12 21 Q. Was she a principal there?

10:30:13 22 A. She was an assistant principal.

10:30:15 23 Q. And who was the principal?

10:30:17 24 A. John Snowdy

10:30:25 25 Q. Okay. As assistant principal did you report to

10:30:28 1 your sister?

10:30:32 2 A. Yes.

10:30:34 3 Q. So she was your supervisor?

10:30:36 4 A. Mr. Snowdy was my supervisor.

10:30:38 5 Q. Was your sister also a supervisor or no?

10:30:40 6 A. I don't know what you mean by supervisor. Yes.

10:30:44 7 I guess the answer is yes.

10:30:46 8 Q. Well, did -- did she participate in any

10:30:50 9 evaluations of you or walk-throughs or observations?

10:30:53 10 A. Walk-throughs.

10:30:55 11 Q. So her walk-throughs were part of an evaluation

10:31:00 12 process that had to be conducted for teachers; correct?

10:31:03 13 A. Right.

10:31:04 14 Q. Was there any other assistant principal at

10:31:07 15 Woodlake Hills Middle School?

10:31:08 16 A. There were three or -- three or four.

10:31:10 17 Q. Three or four?

10:31:12 18 A. Yes.

10:31:14 19 Q. Did other -- did those assistant principals

10:31:15 20 also participate in walk-throughs of you --

10:31:17 21 A. Yes.

10:31:19 22 Q. -- as you were teaching?

10:31:21 23 A. Yes.

10:31:23 24 Q. Okay. So all of the assistant principals you

10:31:25 25 would say would be your supervisor in addition to

10:31:26 1 Mr. Snowdy?

10:31:28 2 A. Snowdy.

10:31:28 3 Q. Snowdy?

10:31:29 4 A. Yes.

10:31:29 5 Q. Is that correct?

10:31:29 6 A. Yes.

10:31:32 7 Q. Okay. Because, basically, you've got the

10:31:33 8 principal and then you've got the assistant principal

10:31:36 9 and that's kind of the management of that campus;

10:31:39 10 correct?

10:31:40 11 A. Yes.

10:31:43 12 Q. And underneath that management umbrella are

10:31:43 13 the -- the teachers and staff; correct?

10:31:44 14 A. Correct.

10:31:48 15 Q. Okay. Did you have one specific assistant

10:31:50 16 principal that you had to report to or were you

10:31:54 17 required to answer to all the assistant principle as

10:31:58 18 well as the principal?

10:31:59 19 A. I recall not just one, all of them.

10:32:01 20 Q. All of them?

10:32:06 21 A. Yes.

10:32:09 22 Q. And would -- would they all be involved in the

10:32:09 23 evaluation process?

10:32:09 24 A. Yes. Like you -- like you said walk-throughs,

10:32:12 25 yes.

10:32:12 1 Q. Okay.

10:32:12 2 A. And evaluations.

10:32:15 3 Q. Okay. So their input would contribute to a

10:32:18 4 teacher's evaluation?

10:32:24 5 A. Yes.

10:32:28 6 Q. Okay. So in 1997 your sister was an assistant

10:32:28 7 principal there?

10:32:28 8 A. Yes. I --

10:32:29 9 Q. Do you -- I'm sorry?

10:32:30 10 A. I think. You know, I'm bad with dates, so I

10:32:33 11 think around about that time, '97, yes.

10:32:38 12 Q. Okay. And do you recall when she became

10:32:42 13 principal?

10:32:42 14 A. No, I don't.

10:32:43 15 Q. Do you recall when Ms. Ruffin became principal?

10:32:50 16 A. I think it was 2001.

10:33:18 17 Q. And if I'm looking at these documents

10:33:20 18 correctly, from 1997, which is at page 7, through the

10:33:25 19 end, you were -- your home campus was number 43, which

10:33:30 20 would have been Woodlake Hills; correct?

10:33:37 21 A. Yes.

10:33:37 22 Q. Okay. Do you recall if Ms. Ruffin started with

10:33:40 23 the district in 2001 as an assistant principal or did

10:33:44 24 she come in as a principal?

10:33:45 25 A. She came in as a principal.

10:33:48 1 Q. From another part of the district or from
11 another school district all together?

10:33:52 12 A. She came from Lafayette, Louisiana.

10:33:56 13 Q. Okay. And when she came, did she -- her coming
14 get -- make -- sorry, let me rephrase. Did her coming
15 to the district and coming specifically to Woodlake
16 Hills mean that your sister was no longer employed at
17 the district?

10:34:15 18 A. She was still employed.

10:34:21 19 Q. But you said she was the principal at Woodlake
20 Hills?

10:34:24 21 A. Yes.

10:34:25 22 Q. So when Ms. Ruffin came, she was the principal
23 at Woodlake Hills; correct?

10:34:32 24 A. That's correct.

10:34:33 25 Q. So somebody had to go?

10:34:36 26 A. Exactly.

10:34:36 27 Q. And who had to go?

10:34:40 28 A. Dr. Zukowski, her -- Ms. Ruffin's
29 brother-in-law at that time removed my sister from that
30 school and placed Ms. Ruffin there.

10:34:47 31 Q. So Dr. Zukowski was Ms. Ruffin's
32 brother-in-law?

10:34:55 33 A. Former brother-in-law.

10:34:55 34 Q. Okay. And if I heard you correctly, you said
10:34:57 35

10:35:00 1 that he placed Ms. Ruffin there. And did he nonrenew
10:35:06 2 your sister's contract?

10:35:06 3 A. No, he didn't.

10:35:07 4 Q. What did he do?

10:35:09 5 A. He placed her -- he -- at first -- his first
10:35:14 6 intent was to place her at another school, but then she
10:35:17 7 was placed in district office.

10:35:23 8 Q. Okay. Was there some kind of discrimination in
10:35:25 9 his doing that?

10:35:27 10 A. I have no idea, ma'am.

10:35:28 11 Q. Did you feel like there was?

10:35:32 12 A. I didn't feel too good about it, neither did my
10:35:35 13 sister.

10:35:36 14 Q. Why not?

10:35:38 15 A. Why would she? When she was doing the job, why
10:35:43 16 would she feel good about it? That's the only answer I
10:35:47 17 have for that.

10:35:49 18 Q. Were -- was it fair to say that you were not
10:35:51 19 happy about it?

10:35:57 20 A. It would be very fair to say that, yes, ma'am.

10:35:59 21 Q. Would it be fair to say that you were angry
10:36:02 22 about it?

10:36:03 23 A. Well, I'm -- I wasn't happy about it.

10:36:08 24 Q. Okay. And were you angry at Dr. Zukowski about
10:36:12 25 it?

10:36:12 1 A. I wouldn't -- I was not angry at -- I was angry
10:36:19 2 about the decision, about the move. I was upset about
10:36:24 3 it, so was my sister.

10:36:26 4 Q. And you feel -- I'm sorry.

10:36:29 5 A. I felt that she was doing the job, so why
10:36:37 6 should she be moved and someone else placed there,
10:36:40 7 someone new.

10:36:41 8 Q. Seemed unfair to you?

10:36:43 9 A. Very unfair.

10:36:43 10 Q. And did your sister complain about that?

10:36:49 11 A. Yes, she did.

10:36:51 12 Q. Did you complain about it?

10:36:54 13 A. No, I -- I listened to her and I tried to help
10:37:00 14 her get through it, to be honest with you.

10:37:06 15 Q. And when you said that she complained about it,
10:37:08 16 did she complain about it to the district?

10:37:10 17 A. I don't have any idea about that, ma'am. I
10:37:13 18 don't know if she did or not.

10:37:16 19 Q. Did you complain --

10:37:17 20 A. A great deal of it -- I'm sorry?

10:37:18 21 Q. No, I'm sorry.

10:37:19 22 A. A great deal of it, she kept it to herself.

10:37:22 23 She made some statements to me, but she kept most of it
10:37:26 24 to herself. So I don't know if she complained to
10:37:28 25 anyone else or not.

10:37:28 1 Q. Now, I asked you, I think, did you complain
10:37:40 2 about it?

10:37:40 3 A. You mean to the district or to someone in
10:37:42 4 the --

10:37:42 5 Q. Just in general.

10:37:43 6 A. I didn't talk about it anymore because I didn't
10:37:45 7 want to upset my sister anymore than she was. If she
10:37:49 8 didn't talk about it, I didn't talk about it.

10:37:50 9 Q. So you didn't complain to the district about
10:37:53 10 it?

10:37:53 11 A. No. That was not my place to do that.

10:37:57 12 Q. Do you -- do you think that the fact that
10:38:07 13 Ms. Ruffin replaced your sister was discriminatory in
10:38:12 14 any way?

10:38:12 15 MR. WAOBIKEZE: Objection, form.

10:38:13 16 A. I can't answer that.

10:38:15 17 BY MS. HISEL:

10:38:18 18 Q. Well, you said you felt it was unfair?

10:38:18 19 A. Yes, I did.

10:38:22 20 Q. And you said that you felt it was unfair
10:38:25 21 because you didn't understand the reason for it. But
10:38:27 22 do you think that there was a reason -- for example, in
10:38:32 23 this -- the reason why we're here today, you had -- you
10:38:36 24 have made some claims, some of which involve race, age,
10:38:40 25 color, and sex; right?